



KREINDLER & KREINDLER LLP | 750 Third Avenue | New York, NY 10017-2725
office: 212.687.8181 | fax: 212.972.9432 | www.kreindler.com

November 6, 2019

VIA ECF

The Honorable George B. Daniels
United States District Court
Southern District of New York
Daniel Patrick Moynihan United States Courthouse
500 Pearl Street
New York, New York 10007

RE: *In Re: Terrorist Attacks on September 11, 2001*, 03 MDL 1570 (GBD) (SN)

Dear Judge Daniels:

We write to ask the Court to extend the time by which counsel for the *Ashton, Burnett, O'Neill* and *Federal Insurance* plaintiffs have to file written objections to the Report and Recommendation of Magistrate Judge Netburn issued on September 30, 2019 and /or to move to reconsider that decision. *See* ECF 5180.

Following the September 30, 2019 decision, we promptly attempted to schedule a meet-and confer, as this Court had directed. *See* ECF 5180 at 12 – 13. In light of the large number of individuals involved as well as various personal and family matters that required the attention of several principals in this matter, we were not able to meet in person with all parties until yesterday, November 5, 2019.

In order to allow the attorneys to consider the positions set forth during the meet-and-confer and determine what issues must be raised in further briefing, we ask that this Court extend the period of time by which written objections to the Report and Recommendation must be filed pursuant to 29 U.S.C. § 636(b)(1) and Fed.R.Civ.P. 72(b), or by which a Motion for Reconsideration must be filed from November 12, 2019 to December 6, 2019. This is the second request for an adjournment. The *Havlish* attorneys have advised us that they do not object to this request.

Respectfully,

Kreindler & Kreindler LLP

/s/ Megan W. Benett

cc: All counsel of record via ECF